

January 21, 2009

Mr. Frank Zeng, P.E.  
Municipal Solid Waste Permits Section  
Waste Permits Division – MC 124  
Texas Commission on Environmental Quality  
P.O. Box 13087  
Austin, TX 78711-3087

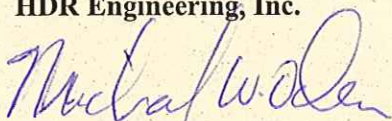
RE: Twin Oaks Landfill - Grimes County  
Municipal Solid Waste (MSW) - Permit No. 2292  
Permit Modification – Response to Notice of Deficiency (NOD)  
Tracking Nos. 12389713 and 12410232; RN100630458/CN600340194

Dear Mr. Zeng:

We have prepared the attached revisions to the landfill site operating plan based on our phone conversation of December 18, 2008 for the Twin Oaks Landfill. The revised pages of the Site Operating Plan (SOP) are attached along with one signed original of the revised document and two copies, one of the copies is in red-line strikeout format. An additional unmarked copy is being sent to Mr. Frank Burleson at the TCEQ Regional office in Waco. Only replacement pages are being re-submitted.

If you have any further questions, please feel free to contact me at (214) 733-5911.

Sincerely,  
**HDR Engineering, Inc.**



Michael W. Oden, P.E.  
Project Manager

Enclosures

CC: Mr. Pete Caler – BVSWMA  
Ms. Samantha Best – BVSWMA  
Mr. Frank Burleson – Waste Program Manager TCEQ Waco  
Ms. Linda Huff – City of Bryan  
Mr. Jay Marcotte – City of Bryan

**Part IV-1  
Site Operating Plan**

**BVSWMA Twin Oaks Landfill  
(Formerly SH-30 Landfill)**

**Brazos Valley Solid Waste Management Agency**

**Permit No. MSW-2292**

**Grimes County, Texas**

**Permit Issued: January 12, 2005**

**January 2009**

**Revision 7**

1-21-2009



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For pages \_\_\_\_ thru \_\_\_\_



ponding of water to eliminate the potential for creating conditions conducive to disease vectors becoming an issue.

Appliances containing chlorinated fluorocarbons (CFCs) must be handled in accordance with 40 CFR 82.156 (f). Appliances with CFC will be separated from the municipal solid waste stream and set aside. A certified contractor or properly trained and certified staff member will remove the CFC. Once the CFC is removed, the appliance may either be disposed in the landfill or recycled.

The tire storage trailer will also be located within the CCA as shown on Figure III.1.2. The trailer will hold a maximum of 2000 tires before being transported off site. The trailer will be enclosed and lockable. The boxes containing recyclable material and the tire storage trailer will be scheduled for off-site transport when full but no less often than 180 days.

The tires will typically be dropped off by customers or retrieved by landfill personnel from the working face and are hauled off when the trailer is full by a licensed recycler. This tire storage facility will be operated in accordance with all applicable rules, including requirements of 30 TAC Chapter 328, Subchapter F.

Establishment and operation of the CCA will conform with all federal, state, and local requirements.

#### ***4.3.3 Oil and Oil Filter Recycling***

Used oil and oil filters will be accepted for recycling at the Twin Oaks Landfill. An area will be designated at the CCA to store these materials until sufficient quantities are collected for off-site transport; typically no more than 120 days. Durable and legible signs will be posted near the entrance to the CCA to identify the area as a Used Oil and Oil Filter Collection Center. Used oil that is delivered to the site will be placed within leak-proof and waterproof containers that can be securely closed and meet the applicable regulatory requirements. Used oil storage containers will be equipped with secondary containment in case of spills. These containers will typically be purchased "igloo" type containers manufactured for this purpose. The Used Oil Collection Center will be registered according to 30 TAC Chapter 324.



*Michael W. Oden*  
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**Table IV.7: Elevations of Leachate Level Sensors (Depth of Leachate) for Each Sump**

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4	221.3	222.2	218.7	0.9	-2.6

\*Leachate depths are measured based on the procedures outlined in this section.

\*\*Pump on and off elevations will be determined based on actual construction elevations of the sump and adjacent liner so that no more than a maximum of 12-inches (30-cm) of leachate will accumulate on the liner before being pumped off.

#### **4.28 Waste Storage or Processing** 30 TAC §330.65(a)

No waste storage or processing (such as waste stabilization) occurs at the Twin Oaks Landfill, other than disposal. As such, the requirements of Subchapter E of 30 TAC §330 are not applicable.



1-21-2009

*Michael W. Oden*

**Part IV-1**

**Attachment IVB: Special Waste Handling Procedures**

**for**

**BVSWMA Twin Oaks Landfill**

**Grimes County, Texas**

1-21-2009



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For pages B-1 thru B-2



Special Waste	Handling Procedure	File Manifest and Ticket?*
Medical Waste	The BVSWM Twin Oaks Landfill does not accept untreated medical waste. Any health care related facility that brings treated medical waste to our facility is visited personally by the Environmental Compliance Officer to assure that they are properly treating the waste. Treated medical waste brought to the facility is handled carefully and covered promptly in order that we may further ensure the safety of landfill employees.	No
Dead Animals	The arrival of dead animals at the landfill is announced from the scalehouse to the working face crew so that an area may be prepared for the animals. The waste is dumped and covered immediately with 3 feet of solid waste or at least 2 feet of soil.	No
Asbestos Containing Material (ACM) that is non-regulated	The BVSWM Twin Oaks Landfill does not accept regulated asbestos containing material (ACM). Non-regulated ACM may be accepted from household customers, but no business/contractor customers (except the City of Bryan, Bryan ISD, City of College Station, and College Station ISD). The non-regulated ACM must arrive at the landfill sealed in containers or bags so that none of the ACM is exposed. The working face personnel must be notified immediately by the scalehouse that the waste has arrived. The working face crew then prepares an area in which the non-regulated ACM is carefully placed and covered so that the material breaks up as little as possible. ACM will be disposed in below-grade lifts, and the location of such material will be marked and noted in landfill records.	No
Empty pesticide, herbicide, fungicide, or rodenticide containers	Empty containers that have been triple-rinsed, containers that are rendered unusable prior to or upon receipt at the landfill, and containers that will be covered by the end of the same working day they are received are accepted for disposal.	No
Sludge, grease trap or grit trap waste	After the appropriate forms and tests regarding the chemical constituents of the waste have been received and approved by the TCEQ, we will accept these materials only if they pass the "paint filter test," Test Method 9095 and if they are certified to contain no free liquids. Sludge is not accepted after 2:00 PM in the afternoon, due to the difficulty in handling the waste late in the day. The scalehouse will notify the working face crew upon arrival of this special waste	Yes
Contaminated Soil and Other Special Waste	Special wastes that receive specific authorization from the TCEQ will be reviewed on a case-by-case basis and BVSWM staff will determine the landfill's ability to safely handle the waste. If the landfill agrees to accept the special waste, we will abide by the specific instructions outlined in the TCEQ letter of authorization. The Environmental Compliance Officer will notify the scalehouse of all special waste that has been approved, and a specific date and time will be set to accept the special waste.	Yes
Hazardous Waste from a Conditionally Exempt Small Quantity Generator	Municipal hazardous waste from a conditionally exempt small quantity generator will be accepted for disposal provided the amount does not exceed 220 pounds per month per generator. Such wastes may be given authorization for acceptance provided it does not interfere with ongoing operations.	No

\* Requires a manifest and a ticket to be filed by the generator or transporter.

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Site Operating Plan**

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**Brazos Valley Solid Waste Management Agency**

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~~October 2008~~ January 2009

Revision ~~6~~7

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The tires will typically be dropped off by customers or retrieved by landfill personnel from the working face and are hauled off when the trailer is full by a licensed recycler. This tire storage facility will be operated in accordance with all applicable rules, including requirements of 30 TAC Chapter 328, Subchapter F.

Establishment and operation of the CCA will conform with all federal, state, and local requirements.

#### **4.3.3 Oil and Oil Filter Recycling**

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**Table IV.7: Elevations of Leachate Level Sensors (Depth of Leachate) for Each Sump**

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3A	221.0	221.9	218.4	0.9	-2.6
4	221.3	222.2	218.7	0.9	-2.6

\*Leachate depths are ~~calculated from the liner elevation adjacent to the Sump~~ measured based on the procedures outlined in this section.

\*\*Pump on and off elevations will be determined based on actual construction elevations of the sump and adjacent liner so that no more than a maximum of 12-inches (30-cm) of leachate will accumulate on the liner before being pumped off.

#### **4.28 Waste Storage or Processing 30 TAC §330.65(a)**

No waste storage or processing (such as waste stabilization) occurs at the Twin Oaks Landfill, other than disposal. As such, the requirements of Subchapter E of 30 TAC §330 are not applicable.

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**Attachment IVB: Special Waste Handling Procedures**

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Dead Animals	The arrival of dead animals at the landfill is announced from the scalehouse to the working face crew so that an area may be prepared for the animals. The waste is dumped and covered immediately with 3 feet of solid waste or at least 2 feet of soil.	No
Asbestos Containing Material (ACM) that is non-regulated	The BVSWM Twin Oaks Landfill does not accept regulated asbestos containing material (ACM). Non-regulated ACM may be accepted from household customers, but no business/contractor customers (except the City of Bryan, Bryan ISD, City of College Station, and College Station ISD). The non-regulated ACM must arrive at the landfill sealed in containers or bags so that none of the ACM is exposed. The working face personnel must be notified immediately by the scalehouse that the waste has arrived. The working face crew then prepares an area in which the non-regulated ACM is carefully placed and covered so that the material breaks up as little as possible. ACM will be disposed in below-grade lifts, and the location of such material will be marked and noted in landfill records.	No
Empty pesticide, herbicide, fungicide, or rodenticide containers	Empty containers that have been triple-rinsed, containers that are rendered unusable prior to or upon receipt at the landfill, and containers that will be covered by the end of the same working day they are received are accepted for disposal.	No
Sludge, grease trap or grit trap waste	After the appropriate forms and tests regarding the chemical constituents of the waste have been received and approved by the TCEQ, we will accept these materials only if they pass the "paint filter test," Test Method 9095 and if they are certified to contain no free liquids. Sludge is not accepted after 2:00 PM in the afternoon, due to the difficulty in handling the waste late in the day. The scalehouse will notify the working face crew upon arrival of this special waste	Yes
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Hazardous Waste from a Conditionally Exempt Small Quantity Generator	Municipal hazardous waste from a conditionally exempt small quantity generator will be accepted for disposal provided the amount does not exceed 220 pounds per month per generator. <del>Additionally the landfill must authorize the acceptance of such waste so that</del> <u>Such wastes may be given authorization for acceptance provided</u> it does not interfere with ongoing operations.	No

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